

The Honorable Richard A. Jones

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON

BLACK LIVES MATTER SEATTLE-KING
COUNTY, ABIE EKENEZAR, SHARON
SAKAMOTO, MURACO KYASHNA-
TOCHA, ALEXANDER WOLDEAB,
NATHALIE GRAHAM, AND ALEXANDRA
CHEN,

Plaintiffs,

vs.

CITY OF SEATTLE,

Defendant.

No. 2:20-CV-00887

DECLARATION OF PETER S. HOLMES
IN SUPPORT OF DEFENDANT CITY OF
SEATTLE'S NOTICE OF INTENT TO
RESPOND TO PLAINTIFFS' MOTION
FOR TEMPORARY RESTRAINING
ORDER

I, Pete Holmes, being over the age of 18 and competent to testify, declare that:

1. I am the City Attorney for the City of Seattle and base this declaration on my own personal knowledge.
2. David Perez, counsel for Plaintiffs in the above-referenced matter, contacted me after 11am on June 9, 2020 and left messages informing me that a lawsuit would be filed that day seeking a Temporary Restraining Order.

DECLARATION OF PETER S. HOLMES
IN SUPPORT OF DEFENDANT CITY OF SEATTLE'S NOTICE OF
INTENT RESPOND TO PLAINTIFFS' MOTION FOR TEMPORARY
RESTRAINING ORDER
(20-cv-00887RAJ) - 1

Peter S. Holmes
Seattle City Attorney
701 5th Avenue, Suite 2050
Seattle, WA 98104-7095
(206) 684-8200

- 1 3. When I spoke with Mr. Perez by phone around 11:25 a.m., it was a brief phone call. The only
2 litigation detail provided to me was that the new lawsuit was related to the ongoing protests.
3 To the best of my recollection, Mr. Perez did not provide me with specific details about the
4 relief that would be sought through a Temporary Restraining Order.
- 5 4. Instead, I provided information to Mr. Perez, namely by telling him how to get me the
6 pleadings and by stating that my office would be ready to discuss shortly after receipt.
- 7 5. Mr. Perez was later asked to propose specific language for a temporary injunction, which he
8 did. Within approximately two hours, the City responded to that proposal by suggesting slight
9 revisions, proposing additional language in line with other recent court orders issued in other
10 cities. Those emails are attached to Assistant City Attorney Sharifi's declaration.

11 DATED this 10th day of June, 2020.

12
13 /s/Peter S. Holmes
14 Peter S. Holmes, WSBA# 15787

15
16
17
18
19
20
21
22
23 DECLARATION OF PETER S. HOLMES
IN SUPPORT OF DEFENDANT CITY OF SEATTLE'S NOTICE OF
INTENT RESPOND TO PLAINTIFFS' MOTION FOR TEMPORARY
RESTRAINING ORDER
(20-cv-00887RAJ) - 2

Peter S. Holmes
Seattle City Attorney
701 5th Avenue, Suite 2050
Seattle, WA 98104-7095
(206) 684-8200